

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

ROSY GIRON DE REYES, *et al.*,

Plaintiffs,

v.

WAPLES MOBILE HOME PARK
LIMITED PARTNERSHIP, *et al.*,

Defendants.

Civil No.: 1:16cv00563-TSE-TCB

CONSENT MOTION TO RESCHEDULE
FINAL PRETRIAL CONFERENCE

Plaintiffs Rosy Giron De Reyes, Jose Dagoberto Reyes, Felix Alexis Bolanos, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz (“Plaintiffs”), and Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A. J. Dwoskin & Associates, Inc. (collectively “Defendants”), by counsel, respectfully submit this Joint Motion to Extend Final Pretrial Conference and Related Deadlines.

On April 18, 2017, the Court issued an Order (Dkt. 191) which, among other things, set the final pretrial conference date for 10:00 a.m. on Friday, April 28, 2017. The parties have since reached an agreement in principle to resolve the remaining claims pending in the above-captioned action. The parties continue to work diligently on the terms of the agreement and expect to file a joint stipulation of dismissal shortly. To provide the parties sufficient time to solidify their agreement, and to avoid burdening the Court in the meantime, the parties respectfully request a brief extension of the final pretrial conference from April 28, 2017 to May 12, 2017, by which time the parties hope to have filed their stipulation of dismissal.

The parties hereby waive oral argument on this motion and request that the Court rule upon the motion without a hearing pursuant to Local Civil Rule 7(J).

A proposed Order is attached.

DATED April 27, 2017

Respectfully submitted,

/s/ Paul Brinkman

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CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of April, 2017, I filed the foregoing Consent Motion to Reschedule Final Pretrial Conference electronically with the Clerk of the Court using the ECF system, and caused to be served by electronic mail a copy of the foregoing document upon the following parties:

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